

## PRIVACY POLICY

At Tymlez, we recognise the importance of your privacy and understand your concerns about the security of the Personal Information you provide to us, whether via the Tymlez Platform or otherwise.

We are bound by the Australian Privacy Principles (**APP**) contained in the Privacy Act (subject to exemptions that are applicable to us under the Privacy Act), our general law obligations of confidentiality to you and all other applicable guidelines and codes in Australia.

### 1. Scope

This privacy policy ("**Policy**") details how Tymlez manages Personal Information about you. Please note that your access and use of the Tymlez Platform is subject to this Policy and the terms of use of the Tymlez Platform. Where this Policy uses a word starting with a capital letter, that term will be defined in the Glossary section or elsewhere in this Policy.

We may, from time to time, review and update this Policy, including taking account of new or amended laws, new technology and/or changes to our operations and practices. All Personal Information held by us will be governed by the most recently updated Policy. Accordingly, please also regularly check our Policy so that you are aware of these updates and changes. If you have any questions, please contact us online at <https://www.tymlez.com/contacts/> or via email at [info@tymlez.com](mailto:info@tymlez.com).

### 2. Acknowledgement

For the above reasons, we recommend that you please read the following details carefully.

By continuing to use the Tymlez Platform and/or registering as an 'investor' with us, you acknowledge that you have had the opportunity to read the Policy, and acknowledge, agree and consent to Tymlez collecting, holding and retaining the Personal Information about you through your use of or access to the Tymlez Platform, and processing, disclosing and/or using your Personal Information in the ways set out in this Policy, and any terms of use of the Tymlez Platform.

By continuing to use the Tymlez Platform and/or registering as an 'investor' with us, you further acknowledge that you are above the age of sixteen (16). If you are below the age of sixteen (16), please discontinue use of the Tymlez Platform immediately. If you are concerned that we may hold Personal Information regarding a person below the age of sixteen (16), please contact us online at <https://www.tymlez.com/contacts/> or via email at [info@tymlez.com](mailto:info@tymlez.com).

### 3. What kinds of information will we collect and hold?

The kinds of Personal Information that we commonly collect and hold from you or about you include: your name, gender, address, phone, fax and mobile numbers, email address and date of birth.

When you browse the Tymlez Platform or contact us electronically, we may record geographical tagging, cookies, statistical data, your IP (internet protocol) address, web browser type and device type to help customise your user experience and to administer the Tymlez Platform.

We do not generally collect Sensitive Information from you or about you unless there is a legal requirement to do so, or unless we are otherwise permitted by law. In all other situations, we will specifically seek your consent for the collection of Sensitive Information.

### 4. How do we collect that information?

We collect Personal Information from you or about you in a number of ways, including:

- when you visit and interact with the Tymlez Platform and related software;
- when you sign up for an account with us or sign up for our newsletter;

- when you submit correspondences to or otherwise communicate with us, whether via the Tymlez Platform, in writing or by email, facsimile or post;
- when you browse the Tymlez Platform and/or other linked or associated social media platforms;
- when you provide any other material to us or to any other persons; and
- through information about you that is available on the internet or that is otherwise published.

We may also collect Personal Information from third parties such as law enforcement agencies and other government entities.

In addition, in connection with your use of the Tymlez Platform, we may also collect cookies and IP addresses, which enables us to tell when you use the Tymlez Platform, to help customise your user experience and to allow us to continue to develop our online services. We use cookies to collect data about your visit and to allow you to navigate from page to page without having to reload each time. You can refuse cookies by using the appropriate setting on your web browser, however, if you do so you may not be able to access portions of the Tymlez Platform. The information we store in cookies shall not be linked to any personally identifiable information you submit while on the Tymlez Platform, however we may also use this data to tailor advertisements to you.

#### **5. How do we hold that information?**

Your Personal Information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for Personal Information and take reasonable steps to ensure that your Personal Information is protected from misuse, interference, loss and unauthorised access, modification and disclosure.

#### **6. The purpose for which we collect, hold, use and disclose Personal Information**

We collect, hold, use and disclose Personal Information from you or about you primarily for the following purposes (where applicable):

- to establish, maintain and administer your account;
- to provide our services to you;
- to answer your queries and communication with you in general;
- for our administrative and accounting functions, fraud checks, marketing and promotions, newsletter communications, website traffic analysis;
- to send you news, promotional or other information about the products or services offered by us and/or our partners, unless you opt out;
- for reporting, research and analysis purposes in order to help develop tourism;
- to help us customize the content, experience, and advertisements provided to you on the Tymlez Platform;
- for any other purposes disclosed at the time of collection.

Where we use your Personal Information for marketing and promotional communications, you can opt out at any time by notifying us.

We will also disclose your information to third party contractors or providers that we retain or use to assist us in providing services to or for you, including database design contractors, our internet service provider and our professional advisers (such as our accountants or lawyers).

Other than as set out above, you will be notified when Personal Information about you will be shared with third parties, and you will have an opportunity to choose not to have us share such information.

We also may share aggregate or anonymise information for third parties, including business partners, advertisers and/or government stakeholders for the purposes set out above and/or of reporting, research and analysis purposes. Please note that this information does not contain any Personal Information about you unless you have consented to the disclosure or use of your Personal Information.

We will not disclose Personal Information about you for any other purposes, except that we may disclose or use your Personal Information where:

- we are under a legal duty to do so, including circumstances where we are under a lawful duty of care to disclose information; or
- such disclosure is authorised or permitted by the APP, law or you.

#### **7. What is the main consequence for you if you do not provide your information to us?**

You can choose not to provide your Personal Information to us. However, if you do not provide your Personal Information to us, you may be unable to:

- use or navigate the Tymlez Platform or any engage in certain Tymlez Platform related activities; and/or
- communicate with us regarding your queries.

Additionally, if you do not provide your Personal Information to us, we may be unable to:

- answer your enquiry; and/or
- provide any other services that you or your organisation have contracted us to provide.

#### **8. External links**

The Tymlez Platform may include links to third party websites. If you access other websites from the links provided on the Tymlez Platform, the operators of those websites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from our Policy. We recommend that you examine the privacy statements posted on those other websites to understand their procedures for collecting, using, and disclosing Personal Information.

#### **9. Destruction and De-identification**

We will retain your Personal Information whilst it is required for any of our business functions, or for any other lawful purpose, which will typically be for a period of seven (7) years.

We use secure methods to destroy or to permanently de-identify your Personal Information when it is no longer needed. Paper records are commonly sent for secure destruction. Electronic records are deleted from all locations, to the best of our ability, or encrypted and/or placed beyond use.

#### **10. Overseas disclosure**

The Tymlez Platform is affiliated with or utilises the services of other businesses located both in Australia and overseas. It is noted some of the third party companies, agents, and contractors that we engage to perform services on our behalf may need to transfer or disclose your Personal Information internationally in order to provide their services. We may also transfer or disclose your Personal Information between members within the Tymlez Group, located in Australia and overseas.

Accordingly, your Personal Information may be disclosed to, stored, and processed by organisations in Australia and overseas. It is noted that some organisations may be located in jurisdictions that may not have data protection laws as comprehensive as those set out in this Policy and the APP.

While we have implemented measures to safeguard your Personal Information in accordance with this Policy at all times, we may not have control over the use, collection, disclosure and retention of your Personal Information by the organisation to which we disclose your Personal Information. We may not require organisations to which we disclose Personal Information in those countries to comply with similar privacy laws. Accordingly your Personal Information may not receive the same protections that it would in Australia, and you may not be able to seek redress in the overseas jurisdiction.

By using and accessing the Tymlez Platform and providing your Personal Information to us, you expressly consent to our disclosure of your Personal Information to those third parties with whom we share it as described in this Policy.

#### **11. How do we keep Personal Information accurate and up to date?**

We rely on the Personal Information we hold about you in providing you with our services or otherwise conducting our business. Therefore, it is important that the information we hold about you is accurate, complete and up-to-date. This means that from time to time we may ask you to tell us if there are any changes to your Personal Information. To assist us to keep our records up-to-date, please advise us immediately when your Personal Information changes.

#### **12. How are you able to access to your Personal Information**

We have procedures in place for dealing with and responding to requests for access to the Personal Information held about you.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access to information as requested, we will give you written reasons why. For further information, please contact us online at <https://www.tymlez.com/contacts/> or via email at [info@tymlez.com](mailto:info@tymlez.com).

#### **13. Anonymity**

You may choose to be anonymous when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

However, in circumstances where you request details about Personal Information held by us, you may be required to provide sufficient details to confirm your identity, to ensure that no unauthorised person is provided with access to Personal Information. We do not disclose Personal Information to any person whose identity cannot be verified.

#### **14. Enquiries & complaints**

We have procedures in place for dealing with complaints and concerns about our practices in relation to the Privacy Act and the APPs. We will respond to your complaint in accordance with the relevant provisions of the APPs. For further information, please contact us online at <https://www.tymlez.com/contacts/> or via email at [info@tymlez.com](mailto:info@tymlez.com).

If we do not agree to provide access to your Personal Information or to amend or annotate the Personal Information we hold about you, you can escalate your enquiry to a formal complaint in writing or by email to us, or by pursuing the matter further with the Office of the Australia Information Commissioner (**OAIC**).

If you have a complaint about any practice, procedure or action taken in regard to your Personal Information, you may apply to the OAIC to investigate the complaint. The OAIC may be contacted at:

- Online: <http://www.oaic.gov.au/about-us/contact-us-page>
- By Phone: 1300 363 992 (Aus) or + 61 2 9284 9749 (International).
- By Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- By Fax: +61 2 9284 9666
- By Post: GPO Box 5218 Sydney NSW 2001

## 15. Contact

You can contact us as follows:

- Online: <https://www.tymlez.com/contacts/>
- By Email: [info@tymlez.com](mailto:info@tymlez.com).

## 16. Glossary

**"Health Information"** is information or an opinion about an individual's health or disability, the health services provided or to be provided to them, their expressed wishes for the provision of future health services, Personal Information collected to provide a health service, Personal Information collected in connection with organ and body-part donation, and predictive genetic information.

**"Personal information"** is information or an opinion about an identified individual, or about an individual who is reasonably identifiable, whether or not the opinion is true or not and whether or not the information is stored in material form or not.

**"Privacy Act"** means *Privacy Act 1988 (Cth)*.

**"Sensitive Information"** is a special category of Personal Information. It is information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, Health Information about an individual or genetic information about an individual that is not otherwise Health Information.

**"Tymlez", "we", "us" or "our"** means any member of the Tymlez Group.

**Tymlez Group** means Tymlez Group Limited ACN 622 817 421 and each of its subsidiaries.

**"Tymlez Platform"** means, collectively, the website, mobile application and any other related applications, which are owned or operated by Tymlez and includes the website located at [www.Tymlez.com](http://www.Tymlez.com).

### Last update

21<sup>st</sup> December 2017